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Attorneys for Debtor

United States Bankruptcy Court  
Northern District of Texas  
Fort Worth Division

**In re:**

**Matthew Landgraf**

Reg. No. 19693-078  
FMC Fort Worth  
PO Box 15330  
Fort Worth, TX 76119  
SSN: xxx-xx-1864

**Case No. 19-41155-elm**

**Chapter 7**

**Debtor**

**MOTION FOR SETTING AND REQUEST FOR EXPEDITED HEARING ON  
MOTION FOR LIMITED RELIEF FROM ORDER APPROVING  
AMENDMENT TO SETTLEMENT**

TO THE HONORABLE EDWARD L. MORRIS, UNITED STATES BANKRUPTCY JUDGE:

Matthew Guy Landgraf (“Debtor”) files this *Motion for Setting and Request for Expedited Hearing on Motion for Limited Relief from Order Approving Amendment to Settlement Agreement*, and in support hereof would respectfully show the Court as follows:

1. The Debtor requests that a hearing be set on May 30, 2023, on the Debtor’s *Motion for Limited Relief from Order Approving Amendment to Settlement* (“Motion”) which was filed on May 23, 2023. A hearing by such date is necessary because the Debtor is authorized to sell real estate on or before May 31, 2023, but the buyer has requested an extension of the closing date to June 30, 2023. If the Court denies the Motion, the pending sale is likely to be lost and the bankruptcy estate may not receive its full recovery of \$686,129.50 from the proceeds of sale.
2. Debtor’s counsel estimates that the expedited hearing will take less than twenty minutes.

3. Notice of the expedited hearing will be provided (a) to all persons who have filed ECF appearances in this case, including counsel of record for the Trustee, through this Court's ECF noticing system and (b) to all persons and entities on the creditor matrix by first class mail postage prepaid. Such notice will be sufficient because this Court's telephonic and videoconference hearing policy will allow any interested party to appear and participate remotely. The relief requested in the Motion makes the Court-approved sale more beneficial for the bankruptcy estate, and an expedited hearing on at least ten days' notice will give all parties in interest plenty of time to consider the Motion and prepare for the hearing.

4. A hearing was not requested earlier because the buyer did not request the extension until May 23, 2023.

5. If an hearing is not heard on or before May 31 then the sales contract will expire and the sale may be lost.

WHEREFORE, PREMISES CONSIDERED, the Debtor requests that this Court enter an Order (a) setting an expedited hearing on Motion for a date on or before May 30, 2023, and (b) granting the Debtor such other and further relief, at law or in equity, to which he may be justly entitled.

DATED: May 24, 2023.

Respectfully submitted:

NORRED LAW, PLLC

By:    /s/ Clayton L. Everett   

Clayton L. Everett

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Counsel for Debtor Matthew Landgraf

**CERTIFICATE OF CONFERENCE**

On May 23, 2023, I contacted Kenneth A. Hill, counsel for the Chapter 7 Trustee. The Chapter 7 Trustee opposes the underlying relief requested in the motion for limited relief and the request for an expedited setting on the same.

/s/ Clayton L. Everett  
Clayton L. Everett

**CERTIFICATE OF SERVICE**

I certify that a true and correct copy of this Motion was served on the Office of the U.S. Trustee and upon the parties receiving notice via the Court's CM/ECF system, including the parties below. A copy was also mailed to the attached creditor's matrix.

*Attorney for the Trustee:*

Kenneth A. Hill  
Quilling, Selander, Lownds, Winslett & Moser, P.C.  
2001 Bryan Street, Suite 1800  
Dallas, TX 75201

*Chapter 7 Trustee:*

Areya Holder Aurzada  
901 Main Street, Suite 5320  
Dallas, Texas 75202

By:   /s/ Clayton L. Everett